



PACIFIC CROSSING

July 31, 2019

VIA IBFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: PC Landing Corp., SCL-LIC-19980807-00010, SCL-MOD-20020807-00086
Notification of *Pro Forma* Transfer of Control

Dear Ms. Dortch:

In accordance with 47 C.F.R. § 1.767(g)(7), PC Landing Corp., the cable landing licensee of the Pacific Crossing cable system (“PC-1”), hereby notifies the Commission of its *pro forma* transfer of control pursuant to an internal reorganization.¹

Pursuant to the internal reorganization, on July 1, 2019, all of the issued and outstanding shares of NTT America, Inc., the immediate parent of PC Landing Corp.,² were transferred from NTT Communications Corporation (“NTT Communications”) to NTT Ltd. As reflected in the attached organizational charts showing PC Landing Corp.’s ownership structure prior to and following the *pro forma* transfer of control, both NTT Communications and NTT Ltd. are wholly-owned subsidiaries of Nippon Telegraph and Telephone Corporation (“NTT”), which remains the ultimate parent of PC Landing Corp.³

This will certify that the referenced transfer of control was *pro forma*, and together with all previous *pro forma* transactions, does not result in a change of PC Landing Corp.’s ultimate control.

¹ See Public Notice, DA No. 02-3177 (Nov. 15, 2002)(modifying PC Landing Corp. Cable Landing License to add *pro forma* notification condition).

² In 2010, pursuant to a prior internal reorganization, all of the issued and outstanding shares of PC Landing Corp. were transferred from its then parent, Pacific Crossing Ltd., to NTT America, Inc. in connection with the liquidation of Pacific Crossing Ltd. See Letter from Todd Rahimi, General Counsel, PC Landing Corp. to Marlene H. Dortch, Secretary, in File No. SCL-T/C-20100218-00005 (Feb. 18, 2010).

³ See PC Landing Corp., Application for Transfer of Control in File No. SCL-T/C-20090715-00022 at 3, 8 (Jul. 15, 2009)(seeking authorization for the transfer of control of PC Landing Corp. to NTT Communications, a wholly-owned subsidiary of NTT).



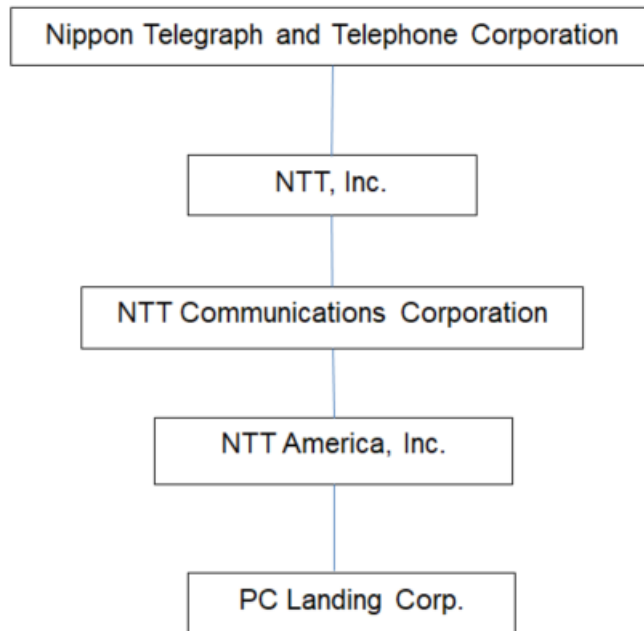
Please direct any questions regarding this notification to the undersigned or to PC Landing Corp.'s counsel, Martin L. Stern at Womble Bond Dickinson, who can be reached at 202-857-4417 or marty.stern@wbd-us.com.

Respectfully submitted,
PC LANDING CORP.

By: /s/ Kurt Johnson
Kurt Johnson
Chief Financial Officer
PC Landing Corp.

cc: Telecommunications and Analysis Division, International Bureau

PC LANDING CORP.
PRE-INTERNAL REORGANIZATION



PC LANDING CORP.
POST-INTERNAL REORGANIZATION
(as of July 1, 2019)

